# EXHIBIT A

#### 

#### PACA TRUST CHART

PACA Trust Creditor: Dave's Specialty Imports, Inc.

NAME OF DEBTOR/DEFENDANTProduce for Less, Inc.COURTU.S.D.C.E.D.N.Y.

Invoice Number	Invoice Date	Payment Due Date	Invoice Balance	Number of Days Overdue 12/12/2019	Accrued Interest through 12/12/2019*	PACA Trust Amount
54959	11/11/19	11/26/219	\$45,843.00	16	\$482.29	\$46,325.29
54978	11/15/19	11/30/219	\$69,600.00	12	\$549.17	\$70,149.17
54988	11/22/19	12/7/19	\$47,910.00	5	\$157.51	\$48,067.51
	<u>I</u>	** Add daily inter	rest in the amount of	\$107.41	Dec. 12, 2019	
		*** Add atte	orney's fees incurred			
·		TOTAL	\$163,353.00		\$1,188.97	\$164,541.97

\* Calculated at the rate of 24.00% annually

\*\* Add daily interest in the amount of \$107.41 from Dec. 12, 2019

<sup>\*\*\*</sup> Claimant reserves the right to include recoverable attorney's fees within Claimaint's PACA trust claim.

# Case 1:19-cv-07136-LDH-PK Document 1-4 Filed 12/20/19 Page 3 of 11 PageID #: 18 Dave's Specialty Imports



11001 NW 124th Street Medley, FL 33178 Phone: (305)603-7988

Invoice #: 54959

**Invoice Date:** 11/11/2019 3:

## Invoice

BILL TO

Produce For Less, Inc.

Sales Type: FOB

402 Ocean Pkwy Unit 306.

Brooklyn, NY 11218-4617 PO #:

2664735

SHIP TO

Produce For Less, Inc.

402 Ocean Pkwy Unit 306.

Brooklyn, NY 11218-4617

PO #:

2664735

Sales Terms: Net 15 Days

Product Description	Product Of	Qty	Price	Amount
Berries Blueberry CHILE 12/6ozDL	Chile	1,306	15.50	20,243.00
Berries Blueberry CHILE 12/6ozDL	Chile	1,650	15.50	25,575.00
Temperature Recorder Charge		1	25.00	25.00
	-	2,956		

NOTES:

**Product:** 

\$45818.00

Charges:

\$25.00

Total:

\$45843.00

Remit Payments To: Dave's Specialty Imports, Inc. 11001 NW 124th Street Medley, FL 33178

All merchandise sold F.O.B. shipping point or our place of business no grade, F.O.B. good delivery unless otherwise noted above. Dave's Specialty Imports must be notified, in writing, of all quality claims within 24 hours of arrival. All claims must be supported by a timely USDA inspection which identifies the label and/or grower name. ABSOLUTELY NO PRICE ADJUSTMENTS WILL BE GIVEN WITHOUT DAVE'S SPECIALTY IMPORTS WRITTEN AUTHORIZATION. All accounts are due and payable 15 days after shipmentdate.

The perishable agricultural commodities listed on this invoice are sold subject to the statutory trust authorized by Section 5(c) of the Perishable Agricultural Commodities Act, 1930 (7 USC 499(e)(c)). The seller of these commodities retains trust claim over these commodities, all inventories of food or other products derived from these commodities, and any receivables or proceeds from the sale of these commodities until full payment is received. NOTICE: Past due invoices shall accrue interest at the rate of 2 % or at the maximum legal rate, whichever is lower. Seller shall be entitled to collect reasonable attorney's fees and expenses as part of an action to collect this invoice. Actual attorney's fees incurred in bringing action to collect on this invoice and/or enforcing any judgment granted and interest shall be considered as additional sums owed in connection with this action.

# Case 1:19-cv-07136-LDH-PK Document 1-4 Filed 12/20/19 Page 4 of 11 PageID #: 19 Dave's Specialty Imports



11001 NW 124th Street Medley, FL 33178 Phone: (305)603-7988

**Invoice #:** 54978

**Invoice Date:** 11/15/2019 1

## Invoice

BILL TO

Produce For Less, Inc.

402 Ocean Pkwy Unit 306. Brooklyn, NY 11218-4617

PO #:

3417857

SHIP TO

Produce For Less, Inc.

402 Ocean Pkwy Unit 306.

Brooklyn, NY 11218-4617

PO #:

3417857

Sales Type: FOB Sales Terms: Net 15 Days

Product Description	Product Of	Qty	Price	Amount
Berries Blueberry ARG 12/11ozDL	Argentina	1,200	29.00	34,800.00
Berries Blueberry ARG 12/11ozDL	Argentina	1,200	29.00	34,800.00
Temperature Recorder Charge		1	0.00	0.00
		2,400		

NOTES:

**Product:** 

\$69600.00

Charges:

Total:

\$0.00 \$69600.00

**Remit Payments To:** Dave's Specialty Imports, Inc. 11001 NW 124th Street Medley, FL 33178

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# Case 1:19-cv-07136-LDH-PK Document 1-4 Filed 12/20/19 Page 5 of 11 PageID #: 20 Dave's Specialty Imports

Daves Specialty Imports

11001 NW 124th Street Medley, FL 33178 Phone: (305)603-7988

**Invoice #:** 54988

**Invoice Date:** 11/22/2019 1:

## **Invoice**

BILL TO

Produce For Less, Inc.

402 Ocean Pkwy Unit 306.

Brooklyn, NY 11218-4617

PO #:

12789770

SHIP TO

Produce For Less, Inc.

402 Ocean Pkwy Unit 306.

Brooklyn, NY 11218-4617

PO #:

12789770

Sales Type: FOB Sales Terms: Net 15 Days

Product Description	Product Of	Qty	Price	Amount
Berries Blueberry ARG 12/11ozDL	Argentina	600	27.00	16,200.00
Berries Blueberry CHILE 12/6ozDL	Chile	1,920	16.50	31,680.00
Temperature Recorder Charge		1	30.00	30.00
	_	2,520		

NOTES:

**Product:** 

Charges:

narges: Total: \$47880.00

\$30.00

\$47910.00

Remit Payments To: Dave's Specialty Imports, Inc. 11001 NW 124th Street Medley, FL 33178

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1240 NW 45th Street Coral Springs, FL 33065 Phone: 954-753-8536		Shipping Date: 11/7/2019 Ship Via:	Invoice #
Bill To Information	Ship To Information		PO#
DAVES	PRODUCE	<u>Destination:</u>	
Dave's Specialty 11240 NW 45th Street	PRODUCE CONNECTION		2664735
11240 (W. 4001 Outet		Temp Recorder #:	Pickup#
Coral Springs FL 33065		05294772 Comments:	0
Customer Phone Customer FAX			
Shipment			
A	Duadina Daariata		
Quantity	Product Description	Country of Origin	
2956 2956 DRIVER RESF MAINTAIN TRI DRIVER RESF	Blueberries 6oz  Total Units  PONSIBLE FOR COUNT.  JCK TEMP AT 34 DEGREES PONSIBLE FOR DAMAGE TO	Chile	TED AΤ
2956 2956 DRIVER RESF MAINTAIN TRI DRIVER RESF	Blueberries 6oz  Total Units  PONSIBLE FOR COUNT.  JCK TEMP AT 34 DEGREES	Chile	ΓED AT
2956 2956  DRIVER RESEMAINTAIN TRIDRIVER RESEIMPROPER TE	Blueberries 6oz  Total Units  PONSIBLE FOR COUNT.  JCK TEMP AT 34 DEGREES  PONSIBLE FOR DAMAGE TO EMPERATURE.	Chile  S. D. PRODUCT IF TRANSPORT  Tree: Lalywal H.	TED AT
2956 2956  DRIVER RESEMAINTAIN TRIDRIVER RESEIMPROPER TE	Blueberries 6oz  Total Units  PONSIBLE FOR COUNT.  JCK TEMP AT 34 DEGREES  PONSIBLE FOR DAMAGE TO  EMPERATURE.  Driver Signature  X-Y-L Temperature Received	Chile  S. D. PRODUCT IF TRANSPORT  Tree: Lalywal H.	ΓED AT

11240 NW 45th Street Coral Springs, FL 33065	ts3fnlcDH-PK Document 1		Pick Ticket
Phone: 954-753-8536			Invoice #
Bill To Information	<b>Ship To Information</b>		
DAVES	PRODUCE		54959
Dave's Specialty	PRODUCE CONNECTION		<u>P0#</u>
11240 NW 45th Street			2664735
Coral Springs FL 33065			Pickup #:
Order Date: 11/7/2019			0
Shipping Date: 11/7/2019	Destination	Truck/Broker	Salesperson

Arrival Date:

# <u>Comments</u>

# Order Detail Order Quantity Product Pick Qty Lot # 1650 Blueberries 6oz EPB 06 1306 Blueberries 6oz EPB 05

Loaded By: \_\_\_\_\_ Date and Time:

11240 NW 45th Street Coral Springs, FL 33065 Phone: 954-753-8536			Pick Ticket
Bill To Information	Ship To Information		<u>Invoice #</u>
DAVES	Produce For		54978
Dave's Specialty	Produce For Less Inc		<u>P0#</u>
11240 NW 45th Street			3417857
Coral Springs FL 33065			Pickup #:
Order Date: 11/13/201			0
Shipping Date: 11/13/2019	Destination	Truck/Broker	Salesperson
Arrival Date:			

#### <u> Order Detail</u> Order Pick Quantity **Product** Qty Lot# Temperature Recorder 1234 1200 Blueberries 11oz GRM 61 1200 Blueberries 11oz GRM 59 **2401 UNITS**

Coral Springs, FL 33065 Phone: 954-753-8536		Shipping Date: 11/20/2019	Invoice #
Bill To Information	Ship To Information	Ship Via:	<b>54988</b>
DAVES Dave's Specialty	Produce For	<u>Destination:</u>	<u>PO#</u>
11240 NW 45th Street	Produce For Less Inc		12789770
		Temp Recorder #:	Pickup#
Coral Springs FL 33065		05294768 Comments:	0
Customer Phone Customer FAX			
Shipment			
Quantity	Product Description	Country of Origin	<u> </u>
600 1920	Blueberries 11oz Blueberries 6oz	Argentina Chile	
2520	Total Units		
DRIVER RESI MAINTAIN TR	PONSIBLE FOR COUNT. UCK TEMP AT 34 DEGREES		RTEN AT
DRIVER RESE MAINTAIN TR DRIVER RESE IMPROPER TO Driver Name:	PONSIBLE FOR COUNT. UCK TEMP AT 34 DEGREES PONSIBLE FOR DAMAGE TO EMPERATURE.  **Driver Signature**	re: GUM	
DRIVER RESI MAINTAIN TR DRIVER RESI IMPROPER TI	PONSIBLE FOR COUNT. UCK TEMP AT 34 DEGREES PONSIBLE FOR DAMAGE TO EMPERATURE.  Driver Signatu  Temperature Received	re: GUM	

11240 NW 45th Street Coral Springs, FL 33065 Phone: 954-753-8536			Page 11 of 11 PageID #
Bill To Information	Ship To Information		<u>Invoice #</u>
DAVES	Produce For		54988
Dave's Specialty	Produce For Less Inc		P0#
11240 NW 45th Street			12789770
Coral Springs FL 33065			<u>Pickup #:</u>
Order Date: 11/19/201			0
Shipping Date: 11/20/2019  Arrival Date:	Destination	Truck/Broker	Salesperson

# Order Quantity Product Pick Qty Lot # 1920 Blueberries 6oz EPB 07 600 Blueberries 11oz GRM 62 2520 UNITS